

EX PARTE OR LATE FILED

Cynthia K. Cox
Executive Director-
Federal and State Relations

Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351
202 463-4104
Fax: 202 463-4196

January 17, 1997

EX PARTE

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W. Room 222
Washington, D.C. 20554

RECEIVED**JAN 17 1997**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket No. 95-116

Dear Mr. Caton:

Today representatives of BellSouth made Ex Parte contacts in the above referenced proceeding to discuss the attached material. Participating for BellSouth were Mike Donze, Ted Kingsley, Bill Shaughnessy and the undersigned. Meetings were held with:

- Dan Gonzalez, Legal Advisor
- Jim Coltharp, Special Advisor
- Jim Casserly, Senior Legal Advisor
- Chris Barnekov, Lloyd Collier, Pat Donovan, Neil Fried, and Len Smith, Competitive Pricing Division of Common Carrier Bureau
- Vaikunth Gupta, Carol Matthey, Jeannie Su, Policy and Program Planning Division of Common Carrier Bureau

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me with any questions.

Sincerley,



Attachment

cc: (w/o attachment)
Dan Gonzalez, Jim Coltharp, Jim Casserly, Chris Barnekov, Lloyd Collier, Pat Donovan, Neil Fried, Len Smith, Vaikunth Gupta, Carol Matthey, Jeannie Su

No. of Copies rec'd _____
List ABCDE

022

Local Number Portability

BellSouth Telecommunications, Inc.

Discussion Points

- **LNP Impact**
- **BellSouth's Schedule Proposal**
- **LNP Cost Recovery Issues**

Atlanta MSA Statistics

- **2.3 million access lines**
- **86 end office switches**
- **9 tandem switches (TOPS, Access, E911)**
- **Switch impacts (Present Estimates)**
 - **DMS Hardware Upgrades: 15 Switches**
 - **5ESS Hardware Upgrades: 10 Switches**
 - **1AESS Upgrade: 1 Switch**
- **CCS Network Impact (Present Estimates)**
- **Increase in signaling traffic due to query load**
 - **Increase in signaling links (+372 by Year End 1997)**
 - **STP impacts**
- **OSS Systems Impacted**
 - **Over 50+ systems identified**
 - **Major Impact on Provisioning and Ordering Systems**

Switch Hardware Impacts by Technology

Present Estimates

- **DMS100**

- **Super Node Processor Upgrade:**

- Atlanta MSA: 15
 - 21 MSAs: 129

- **SN70 Processor Exhaust:**

- Atlanta MSA: 1
 - 21 MSAs: 13

- **1AESS**

- **Memory Upgrade to fast store:**

- Atlanta MSA: 1
 - 21 MSAs: 4
 -

- **EWSD**

- **Processor Upgrade**

- 21 MSAs: 4

- **5ESS**

- **Add DLN:**

- Atlanta MSA 6
 - 21 MSAs: 53

- **Add DLN with CM2 Upgrade:**

- Atlanta MSA 1
 - 21 MSAs: 8

- **3B20D to 3B21D Upgrade:**

- Atlanta MSA: 2
 - 21 MSAs: 9

- **3B20D to 3B21D Upgrade & CM1 to CM2 Upgrade:**

- Atlanta MSA: 1
 - 21 MSAs: 4

Network Testing Requirements

- **Lab Testing Requirements**
 - **New Switch Generic - 1AESS, 5ESS, DMS-100, DMS-200, TOPS, EWSD**
 - **New LNP Software- 1AESS, 4ESS, 5ESS, DMS-100, DMS-200, TOPS , EWSD, DCO**
 - **New SCP Hardware & Software**
- **Live Network Ramp Up**
 - **(Ideally) Start with small Switches**
 - **Ramp up to large FCC Reportable Switches**
 - **Protect Network Integrity**
- **Software Defects Can Cause Deployment Delays**
- **Inter-company / Intra-company Network Testing**
 - **Provisioning**
 - **Call Processing**

LNP Schedule

- **BST's current schedule: First number ported is 10/31/97**
- **BellSouth Proposal from PFR:**
 - **Extend by three months the implementation schedule for 4th Qtr 97 MSAs & 1st Qtr 98 MSAs;**
 - **Allows for additional testing:**
 - **to evaluate additional load on network,**
 - **to fully test inter-company flows,**
 - **to fully test LRN capability,**
 - **to minimize service disruption during implementation;**
 - **Chicago trial results may not be available in a timely manner and will not be totally applicable to all regions;**
 - **Initial MSAs are the largest and should have additional time;**

BellSouth's PFR Proposal

- **BellSouth's Proposal from PFR:**
 - **Extend implementation schedule for first two quarters by three months each;**
 - **Does not affect start date of any quarter;**
 - **Does not affect Commission's goal of a 12/98 completion date for top 100 MSAs;**

LNP- Cost Recovery

- Ensure that the burden of the support mechanism is broadly, fairly, and equitably distributed among all telecommunications service providers.
 - *Type 1 & Type 2 costs should be included in cost recovery mechanism;*
 - *Type 1 & Type 2 costs **would not exist** if LNP were not to be implemented;*
- Ensure that costs do not impose a greater burden on any one group of firms relative to the other firms in a competitive market.
 - *Costs should not impose a greater burden on any one group of firms or disproportionately fall on a single class of carriers.*
 - *The cost recovery mechanism should balance who benefits from LNP and who incurs the bulk of the cost.*
- Promotes fair competition for service between LECs and ALECs by making it impossible for the support mechanism to favor or promote one competitor over another.
 - *Customers should make the decision to change service providers based on factors driven by competition not by the cost recovery mechanism*

Costs Necessary for LNP

**Costs of installing & administering
Regional NPAC / SMS Databases**

(TYPE 1)

Plus

**Direct Carrier- Specific Costs
(TYPE 2)**

Equals

Total LNP Costs

- *Implementation of LNP is an industry-wide, government mandated effort*
- *All Type 1 & Type 2 costs must be incurred for LNP to be successful*
- *All telecommunications carriers will benefit from LNP*

BellSouth's Type II Costs Include

- **SCPs**
- **STPs**
 - **Capacity Enhancements**
- **EO Switch Hardware Upgrades**
- **EO Switch Software Upgrades**
- **Local SMS**
- **Operator Services**
- **SS7 Link Augmentation (*Est.*)**
 - **372 Links by year End 97: 7 % increase**
 - **738 Links by Year End 98: 20% increase**
- **Operational Support Systems**
 - **50+ systems identified**
- **EDI Interface**
- **Testing**
 - **BST Labs**
 - **BST Network Ramp Up**
 - **Intra-Network**
 - **Inter-Network**
- **E911 Impact**
- **Switch Translations**

LNP Cost Recovery

- **Cost recovery mechanism must balance who benefits from LNP and who incurs the bulk of the cost;**
- **Total LNP costs (Type 1 & Type 2) must be allocated across all telecommunications carriers;**
- **The use of “Elemental Access Lines” (as proposed by SBT) is a competitively neutral cost allocator;**
- **Depending on the services a carrier offers, a carrier may be obligated for one, two, or three EALs;**

LNP Cost Recovery

- **Allocation of Type 1 & Type 2 costs is not subsidization but a simple realization that all carriers benefit and that LNP cannot work without full participation of ILECs;**
- **Timely resolution of cost recovery mechanism is imperative;**